

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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Applicant:	Amitabh et al.	Examiner:	Robinson Boyce, A. K.
Title:	Customer Relationship Management System with Compliance Tracking Capabilities	Docket No.:	CHA920030017US1 (IBMC-0072)

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BRIEF OF APPELLANTS

This is an appeal from the Final Rejection dated August 24, 2010, rejecting claims 1-26. This Brief is accompanied by the requisite fee set forth in 37 C.F.R. 1.17(c).

REAL PARTY IN INTEREST

International Business Machines Corp. is the real party in interest.

RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

STATUS OF CLAIMS

As filed, this case included claims 1-26. Claims 1-26 remain pending. Claims 1-26 stand rejected and form the basis of this appeal.

STATUS OF AMENDMENTS

No amendment to the claims has been submitted subsequent to the August 24, 2010 Final Office Action.

SUMMARY OF CLAIMED SUBJECT MATTER

The present invention provides a customer relationship management (CRM) system that is accessible via a network. Below is a concise explanation of the subjected matter defined in the claims which are each involved in this Appeal. In addition, the summary points out elements in the figures that correspond to claim features as well as sections in the specification that discuss the features.

Claim 1 claims a customer relationship management (CRM) system that is accessible via a network (see *e.g.*, p. 5, Ins. 2-8, FIG. 1, element 10), comprising: a user interface that provides distributed access for customers and support providers to case information within the CRM system (see *e.g.*, p. 5, Ins.14-16, FIG. 1, element 12), wherein the customers and the support providers are separate and distinct institutions (see *e.g.*, p. 5, Ins. 10-16); and wherein the user interface provides access to both customers and support providers to a customer case management page for viewing all cases opened for a given customer (see *e.g.*, p. 5, Ins. 14-16, p. 6, Ins. 3-4, FIG. 4, element 30) and a case summary page for viewing details of individual cases stored

within the CRM system (see *e.g.*, p. 6, Ins. 12-17, FIG. 5, element 42); wherein a customer case includes a request from the customer to the support provider for support (see *e.g.*, p. 10, Ins. 16-20); a case management system for managing customer cases (see *e.g.*, p. 7, Ins. 7-12, FIG. 1, element 14), wherein the case management system includes a system for assigning cases to different tiers within a support provider hierarchy (see *e.g.*, p. 7, Ins. 8-21, FIG. 1, element 22), determining whether an assigned tier can resolve the case, and escalating the case to a different tier in response to a determination that the assigned tier cannot resolve the case (see *e.g.*, p. 7, ln. 22 – p. 8, ln. 10, FIG. 1, element 22); and a compliance tracking system (see *e.g.*, p. 9, Ins. 10-11, FIG. 1, element 18) that retrieves previously loaded customer compliance data from a database (see *e.g.*, p. 10, Ins. 8-9); wherein the compliance data consists of information related to whether a customer has met certain required pre-set goals set by the CRM system (see *e.g.*, p. 9, ln. 10 – p. 10, ln. 11), compares the compliance data for each customer with predetermined levels to determine customer compliance, provides a compliance indicator on the customer case management page that indicates whether a compliance issue exists (see *e.g.*, p. 9, Ins. 20-24, p. 10, Ins. 8-11), and escalates the case to a different tier in response to an existence of a compliance issue (see *e.g.*, p. 10, Ins. 12-15, FIG. 1, element 18).

Claim 10 claims a method for providing customer relationship management (CRM) via a computer network (see *e.g.*, p. 5, Ins. 2-8, FIG. 1, element 10, comprising: providing a network node that allows distributed access for customers and support providers to a CRM system (see *e.g.*, p. 5, Ins. 14-16, FIG. 1, element 12); wherein the customers and the support providers are separate and distinct institutions (see *e.g.*, p. 5,

Ins. 10-16); opening a new case within the CRM system when a customer issue occurs (see e.g., p. 5, Ins. 16-17, p. 10, Ins. 16-20); wherein the customer issue includes a request from the customer to the support provider for support (see e.g., p. 5, Ins. 16-17, p. 10, Ins. 16-20); adding the new case to a customer case management page (see e.g., p. 6, Ins. 3-4, FIG. 4, element 30), wherein both customers and support providers have access to the customer case management page (see e.g., p. 5, Ins. 14-16); displaying a compliance indicator when the customer case management page is viewed (see e.g., p. 9, Ins. 19-23, p. 10, Ins. 8-11); wherein the compliance indicator indicates whether a compliance issue exists and is based on information related to whether a customer has met certain required pre-set goals set by the CRM system (see e.g., p. 9, ln. 10 – p. 10, ln. 11), assigning the new case to a first tier support provider (see e.g., p. 7, Ins. 11-16, FIG. 1, element 22); determining if the first tier support provider can handle the new case (see e.g., p. 7, Ins. 17-19); and escalating the new case to a second tier support provider if the first tier support provider cannot handle the case or if a compliance issue exists (see e.g., p. 7, ln. 22 – p. 8, ln. 10, p. 10, Ins. 12-15, FIG. 1, element 18).

Claim 18 claims a program product stored on a recordable medium that provides a customer relationship management (CRM) tool via the web (see e.g., p. 5, Ins. 2-8, FIG. 1, element 10), comprising: a portal page for providing distributed access on the web for customers and support providers to case information within the CRM tool (see e.g., p. 5, Ins. 14-16, FIG. 1, element 12), wherein the customers and the support providers are separate and distinct institutions (see e.g., p. 5, Ins. 10-16); and wherein the portal page provides access to a customer case management page for viewing all

cases opened for a given customer (see e.g., p. 6, Ins. 3-4, FIG. 4, element 30) and a case summary page for viewing details of individual cases (see e.g., p. 6, Ins. 12-17, FIG. 5, element 42), wherein both customers and support providers have access to the customer case management page and the case summary page (see e.g., p. 5, Ins. 14-16); wherein a customer case includes a request from the customer to the support provider for support (see e.g., p. 5, Ins. 16-17, p. 10, Ins. 16-20); a customer management module for managing customer cases (see e.g., p. 7, Ins. 7-12, FIG. 1, element 14) and for assigning cases to different tiers within a support provider hierarchy (see e.g., p. 7, Ins. 8-21, FIG. 1, element 22); and a customer compliance module (see e.g., p. 9, Ins. 10-11, FIG. 1, element 18) that retrieves previously loaded customer compliance data from a database (see e.g., p. 10, Ins. 8-9); wherein the compliance data consists of information related to whether a customer has met certain required pre-set goals set by the CRM system (see e.g., p. 9, ln. 10 – p. 10, ln. 11), compares the compliance data for each customer with predetermined levels to track customer compliance and displays a compliance indicator on the customer case management page that indicates whether a compliance issue exists (see e.g., p. 9, Ins. 20-24, p. 10, Ins. 8-11), and escalates the case to a different tier in response to an existence of a compliance issue (see e.g., p. 10, Ins. 12-15, FIG. 1, element 18).

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

I. Claims 1-7, 9-16, 18-24 and 26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent App. Pub. No. 2009/0063246 (Lurie) in view of U.S. Patent App. Pub. No. 20060293942 (Chaddha) and in view of U.S. Patent No. 7,130,807 (Mikurak).

II. Claims 8, 17 and 25 are rejected as allegedly being unpatentable over Lurie in view of Chaddha and in view of Mikurak and further in view of U.S. Patent App. Pub. No. 2009/0089125 (Sultan).

I. Rejection of claims 1-7, 9-16, 18-24, and 26 as allegedly being unpatentable over Lurie in view of Chaddha and Mikurak

Appellants respectfully submit that the rejections of claims 1-7, 9-16, 18-24, and 26 as allegedly being unpatentable over Lurie in view of Chaddha and Mikurak are defective and request reversal thereof for the following reasons.

The claimed system generally relates to managing requests from customers to support providers for support on a customer issue. In the claimed system, a customer can access the Customer Relationship Management (CRM) System when they have a support issue, request support on their issue, and monitor the status of that issue. On the support provider end, a support provider, that is part of a separate and distinct institution from the customer, can also access the CRM system to provide the necessary support for the customer's issue. Therefore, in the claimed system, both a customer and a support provider can access the CRM System to view case information for a customer's case.

The claimed invention further includes a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain pre-set goals set by the CRM system, to determine whether a compliance issue exists. In other words, the claimed invention determines whether a customer has met certain goals set by the system, *e.g.*, whether a student has taken the requisite courses, or whether a patient has filled the necessary medical prescriptions. If a compliance issue exists, the claimed system escalates the case to a different tier. The Examiner does not assert that any of the cited art teaches or discloses all the claimed features of the

claimed invention, but instead, cites to several references, each allegedly teaching an aspect of the claimed invention. Applicants submit that none of the cited references, either singly or in combination, teach all the claimed elements of the claimed invention that work together in the same way as set forth in the claims.

For example, the first cited reference, Lurie, discloses a system connecting service providers with service seekers, preferably through a live telephone connection. For example, a user could dial a central number, make selections as options are presented, and ultimately be connected to an available service provider. Lurie's system further provides a transaction database which assists service providers in managing service seekers. For example, the database contains a record for each advice communication between a service seeker and a service provider, so that the service providers can track and manage their customers. The Examiner appears to equate this customer management database with the CRM system of the claimed invention.

In the Final Office Action dated 8/24/10, the Examiner argues that in Lurie, system 100 includes one or more service seeker computers 120 connected through a network to a host computer, and therefore, it would be "obvious that the service seeker would also have access to the customer case management page and a case summary page for viewing details of individual cases stored within the CRM system." Final Office Action, p. 18-19. Appellants respectfully disagree. The transaction database in Lurie, as illustrated in FIGS. 3-5, is internal to the service providers, and not available to the service seekers. As shown in FIGS. 3-5, the information included in the database includes notes made by the service providers regarding transactions with service seekers. These notes refer to dollar amounts charged per transaction, promotions

granted, feedback given by the seeker, etc. Obviously, for business and privacy reasons, a service seeker would not have access to such notes made by the service provider. Moreover, in the disclosure, Lurie describes this database as a way for service providers to better manage their customers, not for a customer to manage his own account with a provider.

Therefore, Lurie does not disclose a CRM that is accessible to both service providers and service seekers, nor does Lurie disclose a compliance tracking system that determines whether a service seeker has a compliance issue.

The second cited reference, Chaddha, discloses a CRM system that includes a “compliance module” that monitors usage and leases/licenses to determine whether users are compliant, i.e., an IT provider can determine the status of a user’s software licenses. Chaddha does not disclose a CRM system that is accessible to both service providers and service seekers, nor does Chaddha disclose a compliance tracking system, as in the claimed system, that interacts with the CRM system to escalate cases to different tiers based on a compliance indicator.

The third reference, Mikurak, is cited for the basic concept of different tiers of service providers in a customer service environment. Again, Mikurak, does not disclose a CRM system or a compliance tracking system that interacts with the CRM system in the same way as the claimed invention. In the Final Office Action, the Examiner argues that Mikurak discloses the claimed element of escalating a case to a different tier in response to an existence of a compliance issue. Final Office Action, p. 19-20. Specifically, the Examiner cites to the “alarm step 4710” in Mikurak for disclosure of this element.

However, Mikurak discloses moving a case between different tiers of service if a specific tier cannot process the request. In contrast, in the claimed invention, a customer's case can be escalated to another level not only if it is determined that the assigned tier cannot resolve the case, but also if there is a compliance issue, i.e., if a customer has not met certain required pre-set goals set by the CRM system. In the example cited by the Examiner from Mikurak, an alert is generated if a hardware element fails, not if a compliance issue is determined by a CRM system, as in the claimed invention.

For these reasons, none of the cited references, either singly or in combination, teach or disclose a CRM system that is accessible to both service providers and service seekers, that escalates cases to different tiers appropriately, with a compliance tracking system that determines whether a compliance issue exists, and takes action if such a compliance issue exists. Accordingly, Appellants respectfully submit that the rejections of claims 1-7, 9-16, 18-24, and 26 as allegedly being unpatentable over Lurie in view of Chaddha and Mikurak are defective and request reversal thereof.

II. Rejection of claims 8, 17 and 25 as allegedly being unpatentable over Lurie in view of Chaddha and in view of Mikurak and further in view of Sultan

Appellants respectfully submit that the rejections of claims 8, 17 and 25 as allegedly being unpatentable over Lurie in view of Chaddha and in view of Mikurak and further in view of Sultan are defective and request reversal thereof for the following reasons.

Appellants note that the Examiner relies on its rejection of independent claims 1, 10 and 18, from one of which each of these claims depends. To this extent, Appellants

incorporate the arguments presented above with respect to claims 1, 10 and 18, respectively. Further, Appellants submit that the proposed addition of Sultan, cited for the red, yellow, green compliance indicator claimed in claims 8, 17 and 25, even if proper, fails to address the deficiencies discussed above with respect to the rejections of claims 1, 10 and 18. Again, as with Lurie, Chaddha and Mikurak, Sultan does not disclose a compliance tracking system that interacts with a CRM system as in the claimed invention. As a result, Appellants respectfully request withdrawal of these rejections.

III. Conclusion

In summary, Appellants submit that independent claims 1, 10 and 18 are allowable over the cited art because the Examiner's use of Lurie, Chaddha and Mikurak fails to present a *prima facie* showing that each element of the claimed inventions is taught or suggested by the cited art. Additionally, Appellants respectfully submit that all other pending claims are allowable over the cited art by, *inter alia*, dependency.

Respectfully submitted,

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CLAIMS APPENDIX

Claim Listing:

1. A customer relationship management (CRM) system that is accessible via a network, comprising:

a user interface that provides distributed access for customers and support providers to case information within the CRM system, wherein the customers and the support providers are separate and distinct institutions; and wherein the user interface provides access to both customers and support providers to a customer case management page for viewing all cases opened for a given customer and a case summary page for viewing details of individual cases stored within the CRM system; wherein a customer case includes a request from the customer to the support provider for support;

a case management system for managing customer cases, wherein the case management system includes a system for assigning cases to different tiers within a support provider hierarchy, determining whether an assigned tier can resolve the case, and escalating the case to a different tier in response to a determination that the assigned tier cannot resolve the case; and

a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain required pre-set goals set by the CRM system, compares the compliance data for each customer with predetermined levels to determine customer compliance, provides a compliance indicator on the customer case

management page that indicates whether a compliance issue exists, and escalates the case to a different tier in response to an existence of a compliance issue.

2. The CRM system of claim 1, wherein the case management system further includes a notification system for automatically generating emails when a new case is opened.

3. The CRM system of claim 1, wherein the case management system further includes a system that allows support providers to check-in/check-out cases.

4. The CRM system of claim 1, wherein the case management system further includes a set of business rules that determines what level of case information is to be made available to customers and support providers.

5. The CRM system of claim 1, wherein the case management system further includes a set of business rules that determines how cases are to be assigned and escalated among the different tiers of support providers.

6. The CRM system of claim 1, wherein the compliance tracking system includes a set of business rules that determines a compliance risk level for each customer.

7. The CRM system of claim 6, wherein the compliance risk level is selected from the group consisting of: in compliance, in danger of becoming out of compliance, and out of compliance.

8. The CRM system of claim 7, wherein the compliance indicator comprises a traffic light indicator having a green, yellow and red light.

9. The CRM system of claim 6, wherein the compliance tracking system includes a system for creating a new customer case when a predetermined compliance risk level occurs.

10. A method for providing customer relationship management (CRM) via a computer network, comprising:

- providing a network node that allows distributed access for customers and support providers to a CRM system; wherein the customers and the support providers are separate and distinct institutions;

- opening a new case within the CRM system when a customer issue occurs; wherein the customer issue includes a request from the customer to the support provider for support;

- adding the new case to a customer case management page, wherein both customers and support providers have access to the customer case management page;

- displaying a compliance indicator when the customer case management page is viewed; wherein the compliance indicator indicates whether a compliance issue exists

and is based on information related to whether a customer has met certain required pre-set goals set by the CRM system,

assigning the new case to a first tier support provider;

determining if the first tier support provider can handle the new case; and

escalating the new case to a second tier support provider if the first tier support provider cannot handle the case or if a compliance issue exists.

11. The method of claim 10, wherein the network node comprises a web portal.

12. The method of claim 10, wherein the compliance indicator determines if the customer is in compliance, at risk of becoming out of compliance, or out of compliance.

13. The method of claim 10, comprising the further step of generating email notifications according to a set of business rules.

14. The method of claim 10, comprising the further step of having an assigned support provider check out the case from the CRM system.

15. The method of claim 10, wherein the step of opening a new case is performed by the customer at the network node.

16. The method of claim 10, wherein the step of opening a new case is initiated automatically when the customer is out of compliance.

17. The method of claim 10, wherein the compliance indicator comprises a traffic light indicator having a green, yellow and red light.

18. A program product stored on a recordable medium that provides a customer relationship management (CRM) tool via the web, comprising:

a portal page for providing distributed access on the web for customers and support providers to case information within the CRM tool, wherein the customers and the support providers are separate and distinct institutions; and wherein the portal page provides access to a customer case management page for viewing all cases opened for a given customer and a case summary page for viewing details of individual cases, wherein both customers and support providers have access to the customer case management page and the case summary page; wherein a customer case includes a request from the customer to the support provider for support;

a customer management module for managing customer cases and for assigning cases to different tiers within a support provider hierarchy; and

a customer compliance module that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain required pre-set goals set by the CRM system, compares the compliance data for each customer with predetermined levels to track customer compliance and displays a compliance indicator on the customer case management page that indicates whether a compliance issue exists, and escalates the case to a different tier in response to an existence of a compliance issue.

19. The program product of claim 18, wherein the case management module further includes a notification system for automatically generating emails when a new case is opened.

20. The program product of claim 18, wherein the case management module further includes a system that allows support providers to check-in/check-out cases.

21. The program product of claim 18, wherein the case management module further includes a set of business rules that determines what level of case information is to be made available to customers and support providers.

22. The program product of claim 18, wherein the case management module further includes a set of business rules that determines how cases are to be assigned and escalated among the different tiers of support providers.

23. The program product of claim 18, wherein the compliance tracking module includes a set of business rules that determines a compliance risk level for each customer.

24. The program product of claim 23, wherein the compliance risk level is selected from the group consisting of: in compliance, in danger of becoming out of compliance, and out of compliance.

25. The program product of claim 23, wherein the compliance indicator comprises a traffic light indicator having a green, yellow and red light.

26. The program product of claim 23, wherein the compliance tracking module includes a system for creating a new customer case when a predetermined compliance risk level occurs.

EVIDENCE APPENDIX

No evidence has been entered and relied upon in the appeal.

RELATED PROCEEDINGS APPENDIX

No decisions rendered by a court or the Board in any proceeding are identified in the related appeals and interferences section.